

1 TREVOR J. HATFIELD, ESQ
2 Nevada Bar No. 7373
3 HATFIELD & ASSOCIATES, LTD.
4 703 S. Eighth Street
5 Las Vegas, Nevada 89101
6 Telephone: (702) 388-4469
7 Facsimile: (702) 386-9825
8 Email: thatfield@hatfieldlawassociates.com
9 *Attorneys for Plaintiff*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 KENDRICK CRAWFORD,

13 Plaintiff,

14 vs.

15 NEVADA DEPARTMENT OF
16 TRANSPORTATION, A Department of the
17 State of Nevada; WILSON MARSHALL, an
18 individual employed by the State of Nevada;
19 AND SONNIE BRAIH, an individual
20 employed by the State of Nevada,

21 Defendants.

CASE NO: 2:17-cv-00655-GMN-PAL

22 **STIPULATION AND ORDER**
23 **REQUESTING TIME FOR**
24 **PLAINTIFF TO RESPOND TO**
25 **DEFENDANT'S MOTION FOR**
26 **SUMMARY JUDGMENT**

27 **(First Request)**

28 COMES NOW, Plaintiff KENDRICK CRAWFORD (hereinafter "Plaintiff"), by and
through his counsel, Trevor J. Hatfield, of Hatfield & Associates, Ltd., and Defendants
NEVADA DEPARTMENT OF TRANSPORTATION, WILSON MARSHALL, and SONNIE
BRAIH (hereinafter "Defendants"), by and through their counsel, Adam Paul Laxalt, Attorney
General, Cameron P. Vandenberg, Chief Deputy Attorney General, and Dominika Batten,
Deputy Attorney General, and do hereby stipulate and agree to an extension of time for Plaintiff
to respond to Defendants' Motion for Summary Judgment (ECF #30) that was filed on April 6,
2018. Accordingly, Plaintiff shall have up to and including May 11, 2018 to respond to
Defendants' Motion for Summary Judgment (ECF #30). The Opposition is currently due on
April 27, 2018.

1 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and is the parties' first
2 request for an extension concerning an extension of the time for Plaintiff to respond to
3 Defendant's Motion for Summary Judgment. The reason for the request is due to Plaintiff's
4 attorney having been on a two-week vacation and travel for a settlement conference, this motion
5 having been filed while he was on vacation, and just only recently having an opportunity to meet
6 with Plaintiff to prepare a response to Defendants' motion.
7

8 Dated: April 26, 2018

Dated: April 26, 2018

9 HATFIELD & ASSOCIATES, LTD.

ADAM PAUL LAXALT
Attorney General

10 */s/ Trevor J. Hatfield*

/s/ Cameron P. Vandenberg

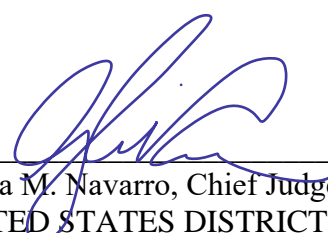
11 _____
12 Trevor J. Hatfield, Esq.
13 Nevada Bar No. 7373
14 703 S. Eighth St.
15 Las Vegas, NV 89101
16 (702) 388-4469 Tel.
(702) 386-9825 Fax
thatfield@hatfieldlawassociates.com
Attorney for Plaintiff

Cameron P. Vandenberg
Nevada Bar No. 4356
Chief Deputy Attorney General
State of Nevada
Office of the Attorney General
5420 Kietzke Lane, Suite 202
Reno, NV 89511
cvandenberg@ag.nv.gov
Attorneys for Defendants

17
18 **ORDER**

19 **IT IS SO ORDERED.**

20 DATED this 26 day of April, 2018.

21 
22 _____
23 Gloria M. Navarro, Chief Judge
24 UNITED STATES DISTRICT JUDGE
25
26
27
28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of April, 2018, I filed and served the parties' **STIPULATION AND [PROPOSED] ORDER REQUESTING TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (First Request)** with the Clerk of the Court using the ECF system which served the parties hereto electronically.

DATED: 26th day of April, 2018

By: Freda P. Brazier
An employee of Hatfield & Associates, Ltd.